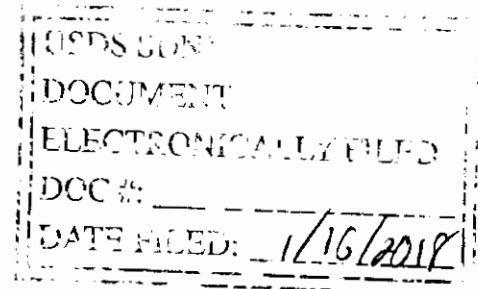




THE CITY OF NEW YORK  
LAW DEPARTMENT

SPECIAL FEDERAL LITIGATION  
DIVISION  
100 Church Street, 3<sup>rd</sup> Floor  
New York, NY 10007



ALEXANDER NOBLE  
phone: (212) 356-2357  
fax: (212) 356-3508  
email: anoble@law.nyc.gov

ZACHARY W. CARTER  
Corporation Counsel

January 16, 2018

**VIA ECF**

Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

APPLICATION GRANTED  
SO ORDERED

*[Signature]*  
1/16/18 John G. Koeltl, U.S.D.J.

Re: Aitabdella Salem v. City of New York, et al.,  
17-CV-4799 (JGK)

Your Honor:

I am an Assistant Corporation Counsel and the attorney for defendants City of New York and Commissioner Joseph Ponte (hereinafter "City Defendants") in the above-referenced matter. City Defendants write to respectfully request (i) a brief extension of time from January 19, 2018 to and including January 23, 2018 to file defendants' motion to dismiss; and (ii) permission to file a memorandum of law with (5) additional pages beyond the page limitation set forth in Your Honor's Individual Practices. Counsel for plaintiff consent to these requests.

As Your Honor is aware, plaintiff filed an Amended Complaint containing 352 paragraphs of factual allegations, and ten documentary exhibits, including two publications on alleged DOC policies and practices, each of which spans at least 20 pages. (*See* Docket Entry No. 51) Defendants have been diligently working finalize their motion papers. However, given the breadth of factual allegations in plaintiff's Amended Complaint, defendants require a brief extension of time and several additional pages in order to fully address plaintiff's claims.

For the reasons set forth above, defendants request (i) a brief extension of time from January 19, 2018 to and including January 23, 2018 to file defendants' motion to dismiss; and (ii) permission to file a memorandum of law with (5) additional pages beyond the page limitation set forth in Your Honor's Individual Practices. Should the Court be inclined to grant these requests, defendants propose the following schedule to complete briefing of defendants' motion to dismiss: defendants serve and file their motion to dismiss on January 23, 2018; plaintiff serve and file his opposition, if any, by February 13, 2018; and defendants serve and file their reply, if any, by February 28, 2018.

Defendants thank the Court for its consideration herein.

Respectfully submitted,

/s/

ALEXANDER NOBLE  
*Assistant Corporation Counsel*  
Special Federal Litigation Division

cc: Welton Kemilious Wisham (*By ECF*)  
*Counsel for Plaintiff*